EXHIBIT A



Service of Process Transmittal

07/01/2013

CT Log Number 523025776

TO:

Jill M Calafiore, Rm 3A119A

AT&T Corp. One AT&T Way

Bedminster, NJ 07921-

RE:

Process Served in Tennessee

FOR:

BellSouth Telecommunications, LLC (Domestic State: GA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:

Antonio Dionysus Huey, Pltf. vs. At & T Corp., et al. including BellSouth Telecommunications, LLC, Dfts.

DOCUMENT(S) SERVED:

Summons, Return, Complaint

COURT/AGENCY:

Davidson County Circuit Court, TN Case # 13C2411

NATURE OF ACTION:

Employee Litigation - Discrimination - Wrongful termination of employment on basis

of disability and race on June 11, 2012

OH WHOM PROCESS WAS SERVED:

CT Corporation System, Knoxville, TN

DATE AND HOUR OF SERVICE:

By Process Server on 07/01/2013 at 11:30

JURISDICTION SERVED:

Tennessee

APPEARANCE OR ANSWER DUE:

Within 30 days from the date this summons is served upon you

ATTORNEY(S) / SENDER(S):

Ann Buntin Steiner Steiner & Steiner 613 Woodland Street Nashville, TN 37206 615-244-5063

ACTION ITEMS:

CT has retained the current log, Retain Date: 07/01/2013, Expected Purge Date: 07/06/2013 | mage SOP

Email Notification, Jill M Calafiore jcalafiore@att.com

SIGNED: PER: ADDRESS: C T Corporation System Amy McLaren 800 S, Gay Street Suite 2021 Knoxville, TN 37929-9710 800-592-9023

TELEPHONE:

Page 1 of 1 / PV

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CIRCUIT COURT SUMMONS			NASHVILLE, TENNESSEE
	DAVIDSO	TENNESSEE ON COUNTY AL DISTRICT	Alias
Antonio Dionysus Huey			CIVIL ACTION DOCKET NO 13024
		Distrates	Method of Service:
Vs.		Plaintiff	Davidson County Sheriff X Out of County Sheriff
Bellsouth Telecommunication	s, LLC		Secretary of State
Agent for Service: C.T. Corpo	ration		Certified Mail
800 S. Gay Street, Suite 2021			Personal Service
Knoxville, TN 37929-9710		Defendant	Commissioner of Insurance
To the above named Defendant:	***		
P.O. Box 196303, Nashville, TN 372 summons is served upon you. You the Plaintiff's attorney at the address	19-6303, and your defense in are further directed to file your ss listed below.	nust be made withir our defense with th	cuit Court, 1 Public Square, Room 302, in thirty (30) days from the date this e Clerk of the Court and send a copy to the will be rendered against you for the RICHARD R. ROOKER
ISSUED: 0/11/2013			Circuit Court Clerk Davidson County Tennessee
		ву: ()	Deputy Clerk
ATTORNEY FOR FLAINTIFF	Ann Buntin Steiner		
or	613 Woodland Street		
PLAINTIFF'S AUDRESS	Nashville, TN 37206		
TO THE SHERIFF:			
Please execute this summons	and make your return hereon a	as provided by law.	
			RICHARD R. ROOKER Circuit Court Clerk
Received this summons for service th		.20 J3 .	2 Dy at 1 #131864 SHERIFF
io reque	est an ADA accommodation, ple	aso contact Dart Gore	at 1010) 000-0008.



RETURN ON PERSONAL SERVICE OF SUMMONS

I hereby certify and return that	at on the	day of	JUL 0 1 201	2		_, 20, 1 :
served this	summons and o	complaint/petition	On	,		
	•				in the follo	owing manner:
Fricka Fry		wth Teleco	mountation	s Tuna		
			after its issuance b	ال الساسل		,
				- 1		
				= 150	2001 TH	131864
			Sheriff/I	Process Se	rver /	
`.	RETUR	N ON SERVICE (OF SUMMONS BY	MAIL		
hereby certify and return, that o	on the	day of		, 20	i sent, posta	ge prepaid by
registered return receipt mail or						
	he defendant,			•	the	day of
		, I received the retu	m receipt for said reg	istered or ce	rtified mail, whic	ch had been sign
у	20 on the	day of			, 20	Said retum
DAY OF		* 11.44 **********************************			TUTE TO SERVE	R OTHER PERSO E PROCESS
NOTARY PUBLIC	-					
MY COMMISSION EXPIRES	Si					
	NOTICE					
TO THE DEFENDANT(S):						
Tennessee law provides a personal property exemption from e should be entered against you in thi	xecution or seizure is action and you wi	to satisfy a judgment. Ish to claim property a	. If a judgment is exempt, you	·	ATTACH	
must file a written list, under cath, o the court. The list may be filed at an	of the items you wish no time and may be	n to claim as exempt v changed by you there	with the clerk of after as necessary;		RETURN	
nowever, unless it is filed before the execution or garnishment issued pri	ior to the filing of the	e list. Certain Items ar	e automatically		RECEIPT HERE	
exempt by law and do not need to b (clothing) for yourself and your famil apparel, family portraits, the family l you would have the right to recover	ly and trunks or oth Bible, and school bo	er receptacles necess ooks. Should any of th	eary to contain such ese items be seized,		(IF APPLICABL	-E)
to exercise it, you may wish to seek	the counsel of a la	wyer.				·
STATE OF TENNESSEE COUNTY OF DAVIDSON	do l	ichard R. Rooker, Chereby certify this to	Clerk of the Circuit Co o be a true and correc	ourt in the Sta at copy of the	ate and County a original summo	aforesaid, ons issued
	111 (1	ino Caca.	RICHARD R. RC	OKER, CLE	RK	
To be completed only if copy certification required.)	•		· _			
			Ву:			D.C.

IN THE CIRCUIT COUR	T FOR DAVIDSON AT NASHVILLE	N COUNTY, TENNESSEE
ANTONIO DIONYSUS HUEY,)	11 1 20 1 20 13
Plaintiff,	,))	Colert Copy
v.)	Case No. 13C. 241
AT & T CORP., BELLSOUTH	.)	
TELECOMMUNICATIONS, INC.	and)	Jury Demand (6)
BELLSOUTH TELECOMMUNICA	ATIONS,)	· ·
LLC,)	•
Defendants.)	

COMPLAINT

Comes the Plaintiff, Antonio Dionysus Huey, and would state unto this Honorable Court as follows:

1. Plaintiff, Antonio Dionysus Huey, brings this action under the Tennessee Human Rights Act, Tenn. Code Ann. § 4-21-101, et. seq. and § 4-21-301, et. seq., and Tenn. Code Ann. § 4-21-401 et. seq. and the Tennessee Disability Act, §8-50-103, et seq. for discrimination, retaliation and hostile work environment. Plaintiff also sues for willful violations of the Family and Medical Leave Act, 29 U.S.C. §2601 et. seq., and for retaliation under this act.

PARTIES

- 2. Plaintiff, Antonio Dionysus Huey, is a citizen and resident of Nashville, Davidson County, Tennessee.
- 3. The Defendant, AT & T Corp., is a private New Jersey corporation operating a telecommunications business in Nashville, Davidson County, Tennessee. The agent for service of process is C.T. Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN, 37929-9710.

- 4. The Defendant, Bellsouth Telecommunications, Inc., is a Georgia corporation operating a telecommunications business in Nashville, Davidson County, Tennessee. The agent for service of process is CT Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929.
- 5. The Defendant, Bellsouth Telecommunications, LLC, is a Georgia corporation operating a telecommunication business in Nashville, Davidson County, Tennessee. The agent for service of process is CT Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929-9710.

FACTS

- 6. Plaintiff, Antonio Dionysus Huey, was hired by BellSouth Telecommunications, Inc. and/or Bellsouth Telecommunications, LLC on June 28, 2005, as an inside sales associate in the internet web department. Defendants, Bellsouth Telecommunications, Inc. and/or Bellsouth Telecommunications, LLC, merged with Defendant, AT & T in early 2007.
- 7. In the course of his employment, Plaintiff sought care from Cynthia Frye, the approved licensed clinical social worker for the Defendants. Ms. Frye diagnosed Plaintiff with depression and anxiety in 2009.
- 8. Because of these serious medical conditions, Plaintiff applied for and was granted leave under FMLA. Cynthia Fyre authorized the FMLA request. Plaintiff began his leave in early 2009 and took leave intermittently for several years. Because of the nature of this illness, Plaintiff would take leave for days on a sporadic basis.
- 9. Plaintiff's supervisor was Naomi Wickham. Plaintiff was told by several supervisors that Naomi Wickham did not like him and the watch his back.

- 10. It is believed Wickham, Plaintiff's Department Center Sales Manager, contacted Defendants' FMLA Benefit Manager, Mary Glass, and expressed a concern about FMLA benefit fraud abuse by Plaintiff. On February 20, 2012, the FMLA Benefit Manager, Mary Glass, told Defendants' Asset Protection Department that Plaintiff was engaging in FMLA benefit fraud abuse and claimed Plaintiff was showing a pattern of abuse of his FMLA benefits. Plaintiff's Department Center Sales Manager concurred with this allegation. Defendants' Asset Protection then, without notifying Plaintiff, hired a contract surveillance company to follow and spy upon Plaintiff.
- 11. On March 22, 2013, March 23, 2013, and April 18, 2013, Plaintiff took FMLA leave. On these days, the surveillance company observed Plaintiff at his girlfriend's house and driving to his child's daycare. He was also observed "in and out of his residence during the observations in March." None of these activities were in contravention of his medical limitations while on leave. Plaintiff's house was also watched on April 18, 2012, and an "unidentified black female" left his residence at approximately 10:30 a.m. The investigators followed the female in her vehicle. When they returned to Plaintiff's house, he was gone and he had gone to work and arrived at 12:00 p.m.
- 12. On May 7, 2012, Plaintiff was called into a meeting with Asset Protection employees, Bill Carroll and Richard Turner, on the pretense of a Benefits Fraud Investigation.

 Plaintiff would assert he did not engage in any fraud.
- 13. Cynthia Frye wrote a letter dated May 8, 2012, in which she stated "as with mental illness, the patient in not confined to a bed but is encouraged to carry out as much of daily functions as possible." This letter was given to Defendants.

- 14. Despite this letter, thereafter, on June 11, 2012, Defendants wrongfully fired Plaintiff for falsifying documents. Plaintiff did not falsify any documents.
- 15. On February 6, 2013, Plaintiff filed an EEOC charge alleging discrimination based upon his disability and his race. Plaintiff has not received his right to sue letter.
- 16. Plaintiff would state he was singled out for investigation and was spied upon based on his race. Similarly situated white employees on FMLA leave were not spied upon or terminated.
- 17. Plaintiff would state he was discriminated against and fired due to his race, in direct violation of the Tennessee Human Rights Act, Tenn. Code Ann. § 4-21-101, et. seq., § 4-21-301, et. seq. and Tenn. Code Ann. § 4-21-401, et. seq.
- 18. Plaintiff would assert that Defendants discriminated and retaliated against him based upon his disability, in violation of the Tennessee Disability Act, §8-50-103, et seq.
- 19. Plaintiff would state that Defendants created a hostile work environment for the Plaintiff.
- 20. Defendants discriminated and retaliated against Plaintiff based upon his taking leave under the Family and Medical Leave Act, 29 U.S.C. § 2601. Defendants knew or showed reckless disregard for whether their conduct was prohibited by the FMLA.

WHEREFORE, PLAINTIFF PRAYS:

1. Plaintiff, Antonio Huey, be granted a judgment against the Defendants in the amount of \$1,500,000.00 for compensatory and other damages suffered by him including, but not limited to, damages for pain and suffering, humiliation and embarrassment, back pay, interest on back pay, lost benefits, medical bills and injury to character and personal injury. Plaintiff also sues for liquidated damages.

- 2. Defendants be ordered to reinstate Plaintiff, with all accumulated salary rights and benefits as if continuously employed from the date of his application and/or for a judgment for front pay, with all accumulated salary rights and benefits, including but not limited to health insurance benefits and long term and short term disability benefits.
- 3. Plaintiff further prays for punitive damages and for pre-judgment interest, attorney's fees, litigation costs, and the cost of this cause.
 - 4. Plaintiff prays for a jury of six (6) to try this cause.
 - 5. Plaintiff prays for such other further relief as may be necessary or appropriate.

Respectfully Submitted,

Ann Buntin Steiner, #11697
The Law Offices of Steiner & Steiner 613 Woodland Street
Nashville, TN 37206
(615) 244-5063
Attorney for Plaintiff, Antonio Huey



Service of Process Transmittal

07/01/2013

CT Log Number 523025903

TO:

Jill M Calafiore, Rm 3A119A

AT&T Corp. One AT&T Way-

Bedminster, NJ 07921-

RE:

Process Served in Tennessee

FOR:

BellSouth Telecommunications, LLC (Domestic State: GA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:

Antonio Dionysus Huey, Pltf. vs. At & T Corp., et al. including BellSouth Telecommunications, Inc., Dfts.

DOCUMENT(S) SERVED:

Summons, Return, Complaint

COURT/AGENCY:

Davidson County Circuit Court, TN Case # 13C2411

NATURE OF ACTION:

Employee Litigation - Discrimination - Wrongful termination of employment on basis

of disability and race on June 11, 2012

ON WHOM PROCESS WAS SERVED:

CT Corporation System, Knoxville, TN

DATE AND HOUR OF SERVICE:

By Process Server on 07/01/2013 at 11:30

JURISDICTION SERVED:

Tennessee

APPEARANCE OR ANSWER DUE:

Within 30 days from the date this summons is served upon you

ATTORNEY(S) / SENDER(S):

Ann Buntin Steiner Steiner & Steiner 613 Woodland Street Nashville, TN 37206 615-244-5063

REMARKS:

Process taken on Bellsouth Telecommunications LLC due to it's conversion in

domestic state.

ACTION ITAMS:

CT has retained the current log, Retain Date: 07/01/2013, Expected Purge Date:

07/06/2013

Image SOP Email Notification, Jill M Calafiore jcalafiore@att.com

SIGNED: PER: ADDRESS: C T Corporation System Amy McLaren 800 S. Gay Street Suite 2021

Knoxville, TN 37929-9710 800-592-9023

TELEPHONE

Page 1 of 1 / PV

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CIRCUIT COURT SUMMONS	3	NASHVILLE, TENNESSEE
	STATE OF TENNESSEE DAVIDSON COUNTY 20 TH JUDICIAL DISTRICT	Alias
Antonio Dionysus Huey		CIVIL ACTION DOCKET NO. BCRLVII
		•
	Plaintiff	Method of Service:
Vs.		Davidson County Sheriff Out of County Sheriff
Bellsouth Telecommunication	s, Inc.	Secretary of State
Agent for Service: C.T. Corpo	ration	Certified Mail
800 S. Gay Street, Suite 2021		Personal Service
Knoxville, TN 37929-9710		Commissioner of Insurance
	Defendant	,
To the above named Defendant:		
relief demanded in the complaint. ISSUED: UN 12012	s action by the above date, judgment by default	RICHARD R. ROOKER
		Davidson County, Tennessee
	By: U	Deputy Clerk
	<u> </u>	Dopaty Gloik
ATTORNEY FOR PLAINTIFF	Ann Buntin Steiner	
or	613 Woodland Street	
PLAINTIFF'S ADDRESS	Nashville, TN 37206	
TO THE SHERIFF:	and make your return hereon as provided by law.	,
riease execute this summons	and make your return hereon as provided by law.	
		Circuit Court Clerk
Received this summons for service th	is 18 day of Jun 2013.	Buzart J #13/864
· · · · · · · · · · · · · · · · · · ·	•	CSHERIFF
To reque	est an ADA accommodation, please contact Dart Gore	at (615) 880-3309.

· it

RETURN ON PERSONAL SERVICE OF SUMMONS

hereby certify and return that on the _	day of	JUL 0 1 2012		, 20,
	.*	•		
served this summons	and complaint/petition	on		
Ericka Fry	45 5 1	·	in the f	ollowing manner
11,2% 51 150	Isouth Telec	smmunications	Inc.	•
	mmons within 90 days	after its issuance beca	ause	
 	i din din din din din din din din din di	the state of the s	**************************************	
		. 10	1 41	Though
		ShariffDro	ocess Senter	775/869
i.		•	0 /	
` RE	TURN ON SERVICE	OF SUMMONS BY MA	AIL	
hereby certify and return, that on the	day of	. · ·	20 I sent, pos	stage prepaid by
egistered return receipt mail or certified ret		•		
to the defendar				day of
	. I received the reti	um receipt for said regist	— ered or certified mail, w	hich had been sig
20 on th				
ceipt is attached to this original summons	 			
DAY OF	, 20		PLAINTIFF'S ATTORNE	
•		AUTHORIZI	ED BY STATUTE TO SEF	RVE PROCESS
NOTARY PUBLIC or	DEPUTY CLERK		. •	
Y COMMISSION EXPIRES:	•		·	
				•
NOTICE	•			
O THE DEFENDANT(S):	· .	•	*	
Tennessee law provides a ten thousan ersonal property exemption from execution or so	id dollar (\$10,000.00) debto	r's equity interest	ATTAC	ЭН
iould be entered against you in this action and the subject of the section and the section of the section	you wish to claim property a	as exempt, you	RETUI	
e court. The list may be filed at any time and m	ay be changed by you then	eafter as necessary;	RECE	
owever, unless it is filed before the judgment be recution or garnishment issued prior to the filing	of the list. Certain items a	re automatically	HERI	•
tempt by law and do not need to be listed; these lothing) for yourself and your family and trunks	or other receptacles neces	sary to contain such	(IF APPLIC	
oparel, family portraits, the family Bible, and schou would have the right to recover them. If you exercise it, you may wish to seek the counsel	do not understand your exe	nese items be seized, emption right or how	(IF APPLIO	ABLL)
			in the State and Cour	ty aforesaid
TATE OF TENNESSEE OUNTY OF DAVIDSON	I, Richard R. Rooker, do hereby certify this t	Clerk of the Circuit Court o be a true and correct c	in the State and Coun opy of the original sum	ıy alvicəalu,
			• •	mons issued
· ·	in this case.	DICUADO D DOO!	CED CLEDK	imons issued
o be completed only if	in this case.	RICHARD R. ROOI	KER, CLERK	nmons issued
To be completed only if oppy certification required.)	in this case.	RICHARD R. ROOI	KER, CLERK	mons issued

IN THE CIRCUIT COURT FOR DA AT NASH	· · · / U D /
ANTONIO DIONYSUS HUEY,) 1200 A GAMADIA
Plaintiff,	
v.) Case No. 13CQ41
AT & T CORP., BELLSOUTH)
TELECOMMUNICATIONS, INC. and BELLSOUTH TELECOMMUNICATIONS,) Jury Demand (6)
LLC,	}
Defendants.)

COMPLAINT

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 - 4. Plaintiff prays for a jury of six (6) to try this cause.
 - 5. Plaintiff prays for such other further relief as may be necessary or appropriate.

Respectfully Submitted,

Ann Buntin Steiner, #11697

The Law Offices of Steiner & Steiner

613 Woodland Street

Nashville, TN 37206

(615) 244-5063

Attorney for Plaintiff, Antonio Huey



Service of Process Transmittal

07/01/2013

CT Log Number 523025899

TO:

Jill M Calafiore, Rm 3A119A

AT&T Corp. One AT&T Way

Bedminster, NJ 07921-

RE:

Process Served in Tennessee

FOR:

AT&T Corp. (Domestic State: NY)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:

Antonio Dionysus Huey, Pltf. vs. AT&T Corp., et al., Dfts.

DOCUMENT(S) SERVED:

Summons, Return, Complaint

COURT/AGENCY:

Davidson County Circuit Court, TN

Case # 13C2411

NATURE OF ACTION:

Employee Litigation - Wrongful Termination - Plaintiff's was wrongfully terminated

from employment on basis of race on June 11, 2012

ON WHOM PROCESS WAS SERVED:

C T Corporation System, Knoxville, TN

DATE AND HOUR OF SERVICE:

By Process Server on 07/01/2013 at 11:30

JURISDICTION SERVED:

Tennessee

APPEARANCE OR ANSWER DUE:

Within 30 days after date of service

ATTORNEY(S) / SENDER(S):

Ann Buntin Steiner Steiner & Steiner 613 Woodland Street Nashville, TN 37206 615-244-5063

ACTION ITEMS:

CT has retained the current log, Retain Date: 07/01/2013, Expected Purge Date: 07/11/2013

Image SOP Email Notification, Jill M Calafiore jcalafiore@att.com

SIGNED:

PER: ADDRESS:

C T Corporation System Amy McLaren 800 S. Gay Street Suite 2021 Knoxville, TN 37929-9710 800-592-9023

TELEPHONE:

Page 1 of 1 / RP

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	S	NASHVILLE, TENNESSEE
	STATE OF TENNESSE DAVIDSON COUNTY 20 TH JUDICIAL DISTRIC	Alias
Antonio Dionysus Huey		CIVIL ACTION
Aritonio Dionysus riuey		DOCKET NO. 13C 4411
· · · · · · · · · · · · · · · · · · ·		
	Plaintiff	Method of Service:
Vs.		Davidson County Sheriff
	·	X Out of County Sheriff
AT&T Corp.		Secretary of State
Agent for Service: C.T. Corpor	ration	Certified Mail
800 S. Gay Street, Suite 2021		Personal Service
Knoxville, TN 37929-9710	Defendant	Commissioner of Insurance
	ss listed below.	
In case of your failure to defend this relief demanded in the complaint. ISSUED: 4 (2013)	s action by the above date, judgment by defau	It will be rendered against you for the RICHARD R. ROOKER Circuit Court Clerk Davidson County Tennessee
In case of your failure to defend thirelief demanded in the complaint. ISSUED: 4 1 2013		RICHARD R. ROOKER Circuit Court Clark
In case of your failure to defend thirelief demanded in the complaint. ISSUED: 4 11 2013		RICHARD R. ROOKER Circuit Court Clark
In case of your failure to defend this relief demanded in the complaint. ISSUED: (2013)		RICHARD R. ROOKER Circuit Court Clerk Davidson County Tennessee
relief demanded in the complaint. ISSUED: (9/1) (2013	s action by the above date, judgment by defau	RICHARD R. ROOKER Circuit Court Clerk Davidson County Tennessee
relief demanded in the complaint. ISSUED: (O/I) (2013) ATTORNEY FOR PLAINTIFF	Ann Buntin Steiner 613 Woodland Street Address	RICHARD R. ROOKER Circuit Court Clerk Davidson County Tennessee
ATTORNEY FOR PLAINTIFF or PLAINTIFF'S ADDRESS	Saction by the above date, judgment by defaution by the above date, judgment by defaution by:	RICHARD R. ROOKER Circuit Court Clerk Davidson County Tennessee
ATTORNEY FOR PLAINTIFF or PLAINTIFF'S ADDRESS TO THE SHERIFF:	Ann Buntin Steiner 613 Woodland Street Address Nashville, TN 37206	RICHARD R. ROOKER Circuit Court Clerk Davidson County Tennessee
ATTORNEY FOR PLAINTIFF or PLAINTIFF'S ADDRESS TO THE SHERIFF:	Ann Buntin Steiner 613 Woodland Street Address	RICHARD R. ROOKER Circuit Court Clerk Davidson County Fennessee Deputy Clerk
ATTORNEY FOR PLAINTIFF or PLAINTIFF'S ADDRESS TO THE SHERIFF:	Ann Buntin Steiner 613 Woodland Street Address Nashville, TN 37206	RICHARD R. ROOKER Circuit Court Clerk Davidson County Tennessee
ATTORNEY FOR PLAINTIFF or PLAINTIFF'S ADDRESS TO THE SHERIFF:	Ann Buntin Steiner 613 Woodland Street Address Nashville, TN 37206 and make your return hereon as provided by law.	RICHARD R. ROOKER Circuit Court Clark Davidson County Fennessee Deputy Clerk RICHARD R. ROOKER

RETURN ON PERSONAL SERVICE OF SUMMONS

I hereby certify	and return that on the	day of	JUL 0 1 2012		, 20, I:
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			Sheriff/Process	Server /	. •
	R	ETURN ON SERVICE OF	SUMMONS BY MAIL		
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STATE OF TEN		do hereby certify this to b	rk of the Circuit Court in the e a true and correct copy o	State and County aforther state original summon	oresaid, s issued
		in this case.	RICHARD R. ROOKER,	CLERK	
To be completed copy certification	d only if				
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IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE

ANTONIO DIONYSUS HUEY,

Plaintiff,

V.

Case No. 3C21647

Case No. 3C21647

Defendants.

COMPLAINT

Comes the Plaintiff, Antonio Dionysus Huey, and would state unto this Honorable Court as follows:

1. Plaintiff, Antonio Dionysus Huey, brings this action under the Tennessee Human Rights Act, Tenn. Code Ann. § 4-21-101, et. seq. and § 4-21-301, et. seq., and Tenn. Code Ann. § 4-21-401 e. seq. and the Tennessee Disability Act, §8-50-103, et seq. for discrimination, retaliation and hostile work environment. Plaintiff also sues for willful violations of the Family and Medical Leave Act, 29 U.S.C. §2601 et. seq., and for retaliation under this act.

PARTIES

- 2. Plaintiff, Antonio Dionysus Huey, is a citizen and resident of Nashville, Davidson County, Termessee.
- 3. The Defendant, AT & T Corp., is a private New Jersey corporation operating a telecommunications business in Nashville, Davidson County, Tennessee. The agent for service of process is C.T. Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN, 37929-9710.

- 4. The Defendant, Bellsouth Telecommunications, Inc., is a Georgia corporation operating a telecommunications business in Nashville, Davidson County, Tennessee. The agent for service of process is CT Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929.
- 5. The Defendant, Bellsouth Telecommunications, LLC, is a Georgia corporation operating a telecommunication business in Nashville, Davidson County, Tennessee. The agent for service of process is CT Corporation System, 800 S. Gay Street, Suite 2021, Knoxville, TN 37929-9710.

FACTS

- 6. Plaintiff, Antonio Dionysus Huey, was hired by BellSouth Telecommunications, Inc. and/or Bellsouth Telecommunications, LLC on June 28, 2005, as an inside sales associate in the internet web department. Defendants, Bellsouth Telecommunications, Inc. and/or Bellsouth Telecommunications, LLC, merged with Defendant, AT & T in early 2007.
- 7. In the course of his employment, Plaintiff sought care from Cynthia Frye, the approved licensed clinical social worker for the Defendants. Ms. Frye diagnosed Plaintiff with depression and anxiety in 2009.
- 8. Because of these serious medical conditions, Plaintiff applied for and was granted leave under FMLA. Cynthia Fyre authorized the FMLA request. Plaintiff began his leave in early 2009 and took leave intermittently for several years. Because of the nature of this illness, Plaintiff would take leave for days on a sporadic basis.
- 9. Plaintiff's supervisor was Naomi Wickham. Plaintiff was told by several supervisors that Naomi Wickham did not like him and the watch his back.

- 10. It is believed Wickham, Plaintiff's Department Center Sales Manager, contacted Defendants' FMLA Benefit Manager, Mary Glass, and expressed a concern about FMLA benefit fraud abuse by Plaintiff. On February 20, 2012, the FMLA Benefit Manager, Mary Glass, told Defendants' Asset Protection Department that Plaintiff was engaging in FMLA benefit fraud abuse and claimed Plaintiff was showing a pattern of abuse of his FMLA benefits. Plaintiff's Department Center Sales Manager concurred with this allegation. Defendants' Asset Protection then, without notifying Plaintiff, hired a contract surveillance company to follow and spy upon Plaintiff.
- 11. On March 22, 2013, March 23, 2013, and April 18, 2013, Plaintiff took FMLA leave. On these days, the surveillance company observed Plaintiff at his girlfriend's house and driving to his child's daycare. He was also observed "in and out of his residence during the observations in March." None of these activities were in contravention of his medical limitations while on leave. Plaintiff's house was also watched on April 18, 2012, and an "unidentified black female" left his residence at approximately 10:30 a.m. The investigators followed the female in her vehicle. When they returned to Plaintiff's house, he was gone and he had gone to work and arrived at 12:00 p.m.
- 12. On May 7, 2012, Plaintiff was called into a meeting with Asset Protection employees, Bill Carroll and Richard Turner, on the pretense of a Benefits Fraud Investigation. Plaintiff would assert he did not engage in any fraud.
- 13. Cynthia Frye wrote a letter dated May 8, 2012, in which she stated "as with mental illness, the patient in not confined to a bed but is encouraged to carry out as much of daily functions as possible." This letter was given to Defendants.

- 14. Despite this letter, thereafter, on June 11, 2012, Defendants wrongfully fired Plaintiff for falsifying documents. Plaintiff did not falsify any documents.
- 15. On February 6, 2013, Plaintiff filed an EEOC charge alleging discrimination based upon his disability and his race. Plaintiff has not received his right to sue letter.
- 16. Plaintiff would state he was singled out for investigation and was spied upon based on his race. Similarly situated white employees on FMLA leave were not spied upon or terminated.
- 17. Plaintiff would state he was discriminated against and fired due to his race, in direct violation of the Tennessee Human Rights Act, Tenn. Code Ann. § 4-21-101, et. seq., § 4-21-301, et. seq. and Tenn. Code Ann. § 4-21-401, et. seq.
- 18. Plaintiff would assert that Defendants discriminated and retaliated against him based upon his disability, in violation of the Tennessee Disability Act, §8-50-103, et seq.
- 19. Plaintiff would state that Defendants created a hostile work environment for the Plaintiff.
- 20. Defendants discriminated and retaliated against Plaintiff based upon his taking leave under the Family and Medical Leave Act, 29 U.S.C. § 2601. Defendants knew or showed reckless disregard for whether their conduct was prohibited by the FMLA.

WHEREFORE, PLAINTIFF PRAYS:

1. Plaintiff, Antonio Huey, be granted a judgment against the Defendants in the amount of \$1,500,000.00 for compensatory and other damages suffered by him including, but not limited to, damages for pain and suffering, humiliation and embarrassment, back pay, interest on back pay, lost benefits, medical bills and injury to character and personal injury. Plaintiff also sues for liquidated damages.

- 2. Defendants be ordered to reinstate Plaintiff, with all accumulated salary rights and benefits as if continuously employed from the date of his application and/or for a judgment for front pay, with all accumulated salary rights and benefits, including but not limited to health insurance benefits and long term and short term disability benefits.
- 3. Plaintiff further prays for punitive damages and for pre-judgment interest, attorney's fees, litigation costs, and the cost of this cause.
 - 4. Plaintiff prays for a jury of six (6) to try this cause.
 - 5. Plaintiff prays for such other further relief as may be necessary or appropriate.

Respectfully Submitted,

Ann Buntin Steiner, #11697
The Law Offices of Steiner & Steiner 613 Woodland Street
Nashville, TN 37206
(615) 244-5063
Attorney for Plaintiff, Antonio Huey